

DEC 31 1990

Support Consultants and Associates, Inc.  
ATTN: Keith E. Moon  
Route 2, Box 254  
De Leon, Texas 76444

Gentlemen:

This is in response to your letter dated September 18, 1990, submitted on behalf of Hole Truth, Inc., NRC License No. 35-23304-01. Your letter responded to our letter and Notice of Violation dated August 21, 1990, wherein we identified a violation in regard to possession of a radionuclide not authorized by license. In our letter we also responded to the licensee's request to relax a requirement for three remaining independent audits by stating that a final independent audit should be completed.

In your letter you first state that you do not believe that possession of antimony-124 constitutes a health physics hazard. We agree with your statement under the circumstances since the licensee was duly licensed to possess other radionuclides with similar hazard potential. However, our concern was that the licensee had acquired a radioactive material for which it was not licensed to possess. We view such matters of primary importance since this is the underlying basis for the licensing process. We expect licensees to adhere to conditions of their licenses, and we expect consultants who perform audits of licensed activities to be able to identify violations of license conditions such as this that occur. The intended purpose of requiring independent audits is to enable an evaluation of a licensee's program at least equivalent to that performed by NRC personnel.

We note your views and your comments in regard to our inspection and enforcement policies that we believe do not need to be addressed in this forum.

You further petition that the requirement for a final audit be relaxed. We have reviewed your arguments plus those of the licensee's president in his letter dated September 17, 1990. A recent telephonic discussion between Mr. L. D. Robertson of Hole Truth, Inc., and Mr. C. L. Cain of my staff disclosed that Mr. Robertson has reconsidered his response and now believes that an independent audit by your firm is in his best interest. Enclosed is a copy of our response to the licensee which sets forth our conclusions in this matter.

\*RIV:C:NMIS  
CLCain  
/ /90

D: BRS  
ABBeach  
12/29/90

\*Previously concurred

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Support Consultants and  
Associates, Inc.

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If you have further questions in regard to this matter, please contact the undersigned.

*Original Signed By:*

**A. B. BEACH**

A. Bill Beach, Director  
Division of Radiation Safety  
and Safeguards

Enclosure: As stated

cc:  
Hole Truth, Inc.  
ATTN: L. D. Robertson  
P.O. Box 96756  
Oklahoma City, Oklahoma 73143

bcc:  
DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
MRodriguez, OC/LFDCB (4503)  
WLFisher  
CLCain  
NMSIS  
MIS System  
RIV Files (2)  
RSTS Operator  
REHall, URFO